PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

GENERAL ELECTRIC COMPANY
MILWAUKEE, WISCONSIN
WID 000 808 725

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EPA Region	:	5
Site No.	:	WID 000 808 725
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Prepared by	:	PRC Environmental Management, Inc. Kurt Whitman
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the General Electric Company Medical Systems Group (GE Medical Systems) facility located at 300 and 315 West Edgerton Avenue in Milwaukee, Wisconsin. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The GE Medical Systems facility is located in a mixed-use area within an industrial park. Both locations of the GE Medical Systems facility have operated under the same U.S. Environmental Protection Agency (EPA) identification number (WID 000 808 725). The facility manufactures electrical transformers and electrical components for x-ray equipment. The RCRA closure of the facility's hazardous waste management units was approved by the Wisconsin Department of Natural Resources on Jasnuary 26, 1989. The portion of the facility located at 300 West Edgerton Avenue is no longer used by GE Medical Systems. It was gutted and remodeled by the owners of the building. Current tenants include Instrumentation, Inc., a distributor of medical diagnostic equipment; Federal Mailing Systems, Inc., a sorter and distributor of U.S. mail; and Total Delivery, a warehouse storage company. The 315 West Edgerton Avenue location is currently in operation and occupies about 2.2 acres across the street from 300 West Edgerton Avenue. In 1988, GE Medical Systems withdrew the Part B permit application for the 315 West Edgerton Avenue location. In 1989, WDNR granted small-quantity generator (SQG) status to the 315 West Edgerton Avenue location.

The 315 West Edgerton Avenue location currently operates as a SQG of ignitable (D001), corrosive (D002), and solvent-based (F001, F002, F003, U069 and U112) hazardous wastes.

The PA/VSI identified the following five SWMUs at the facility:

1. Scrap Metal Collection Area (315 West Edgerton Avenue)
2. Drum Storage Area (315 West Edgerton Avenue)
3. Waste Oil Underground Storage Tank (315 West Edgerton Avenue)
4. Hazardous Waste Storage Area (300 West Edgerton Avenue)
5. Aboveground Storage Tank (300 West Edgerton Avenue)

PRC did not identify any AOC's at the facility. PRC observed a black stain above the Waste Oil Underground Storage Tank (UST) (SWMU 3). This stain was located on the concrete

that covered the area from the oil pump to the concrete masonry wall. During the VSI, all facility SWMUs appeared to have sound containment.

The potential is low for release of hazardous constituents from the facility to surface water, ground water, air, and on-site soils.

The Scrap Metal Collection Area (SMCA) (SWMU 1), Drum Storage Area (DSA) (SWMU 2), and the Waste Oil (UST) (SWMU 3) are active and have adequate secondary containment. The SMCA (SWMU 1) and Waste Oil UST (SWMU 3) are not used to store hazardous waste. The DSA (SWMU 2) is used to store hazardous waste for less than 90 days. It also stores raw materials. The potential for contamination from the HWSA (SWMU 4) and AST (SWMU 5) is unknown because these 2 SWMUs were closed by GE in 1987. During the VSI, four waste drums in the DSA were not labeled as hazardous waste and were not marked with the accumulation start date. WDNR last inspected the facility on November 16, 1988. GE Medical Systems closed the Hazardous Waste Storage Area (HWSA) (SWMU 4) in 1987 and the Aboveground Storage Tank (AST) (SWMU 5) in 1988. Both closures were approved by WDNR in 1989.

Surface water from Lake Michigan is the only source of drinking and industrial water for the facility. The nearest drinking water well is located upgradient 1.5 miles southwest of the facility. No downgradient wells have been identified within a 2-mile radius. The nearest industrial water well is 2 miles south of the facility. Ground water and surface water in the area flow in an easterly direction. Residential areas lie within 0.5 mile of the facility. The SMCA (SWMU 1) and DSA (SWMU 2) are enclosed and located inside, limiting access and potential exposure to contamination. Sensitive environments in the area include one wetland 2.0 miles south-southeast of the facility. The closest surface water location is Lake Michigan, 3.6 miles east of the facility. The nearest school, St. Stephen's School, is located about 1 mile southeast of the facility.

The overall potential for release of hazardous constituents from this facility is low. PRC recommends that GE Medical Systems properly label all drums of waste in the DSA(SWMU 2) and seal the crack between the masonry wall and concrete pad at the Waste Oil UST (SWMU 3).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the General Electric Company Medical Systems Group (GE Medical Systems) facility at 300 and 315 West Edgerton Avenue in Milwaukee, Wisconsin. The PA was completed on January 22, 1992. PRC gathered and reviewed information from Wisconsin Department of Natural Resources (WDNR) and from EPA Region 5 RCRA files. Additional information was gathered from the U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), U.S. Department of Agriculture (USDA), Wisconsin Geological and Natural History Survey (WGNHS), Wisconsin Wetlands Inventory (WWI), and GE Medical Systems. The VSI was conducted on January 23, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. Five SWMUs and no AOCs were identified at the facility.

The VSI is summarized and four inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

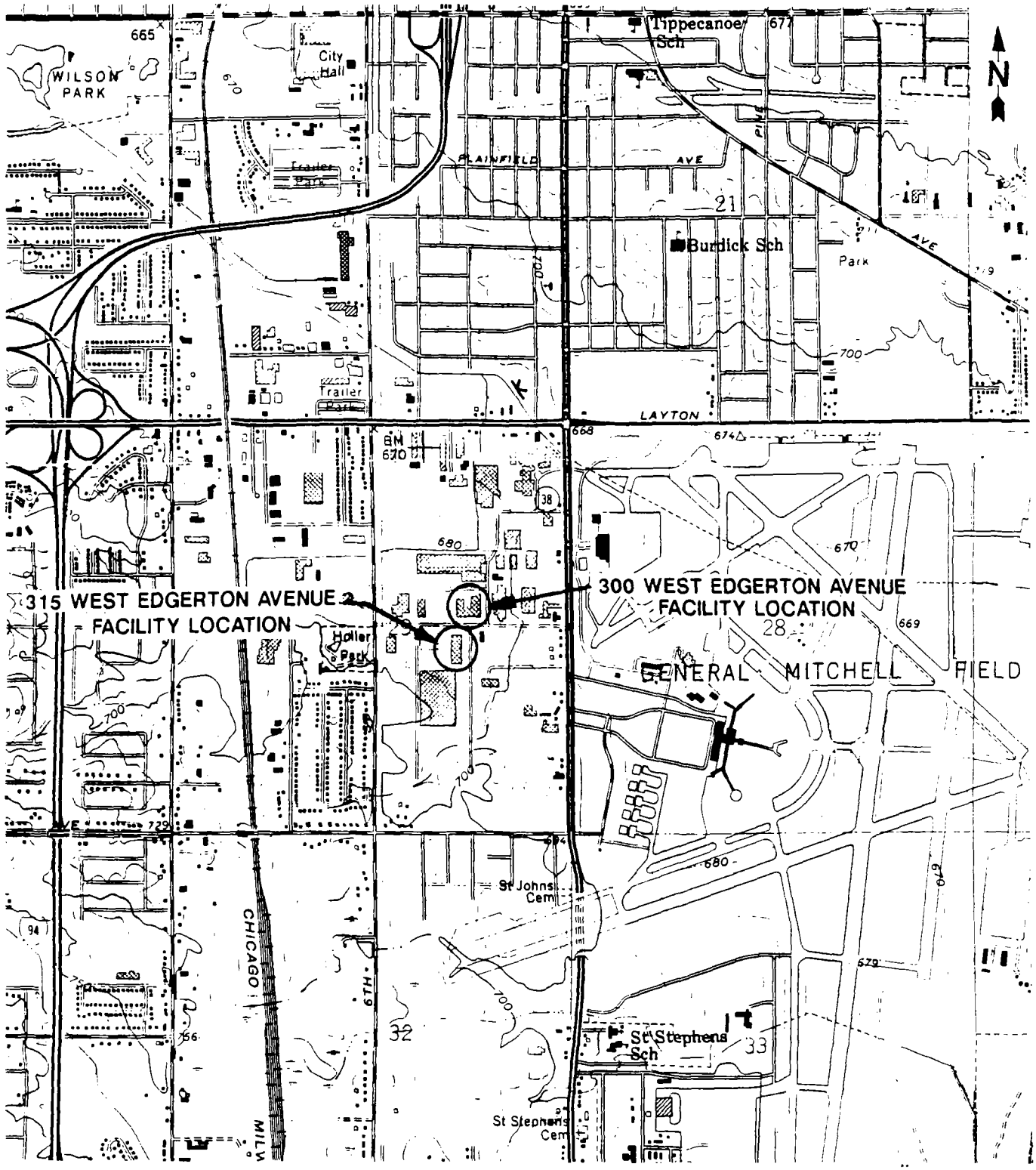
The GE Medical Systems facility is located at 300 and 315 West Edgerton Avenue in Milwaukee, Milwaukee County, Wisconsin (latitude 42°57'05" N and longitude 87°54'25" W), as shown in Figure 1. The facility occupies a total of 3.6 acres in a mixed-use area.

Both GE Medical Systems locations have operated under the same EPA identification number (WID 000 808 725). The 1.4-acre location at 300 West Edgerton Avenue is bordered on the north by a clothing manufacturer, on the west by a vacant lot, on the south by Edgerton Avenue, and on the east by the U.S. Post Office. It is no longer used by GE Medical Systems.

The 2.2-acre location at 315 West Edgerton Avenue is currently operational. It is bordered on the north by Edgerton Avenue, on the west by a vacant lot; on the south by a warehouse owned by C & H Distributors, Inc., a product distributor for business and industry; and on the east by Third Street. Airport support services and freight terminal companies are located across Third Street.

2.2 FACILITY OPERATIONS

The facility's two locations were built in the 1960's. The current and past owner of both locations is Sampson Investments (formerly Apex Investments Associates, Inc.), located at 222 East Erie Street, Milwaukee, Wisconsin. GE Medical Systems has leased both facilities from Sampson Investments since the early 1970's. The 300 West Edgerton Avenue location was operated by General Electric Company Cardio Systems Group until 1984, when GE Medical Systems Group took over operation of the facility (GE Medical Systems, 1992a). In 1989, GE Medical Systems terminated the lease at this location. The current tenants of the 300 West Edgerton Avenue location includes an office complex consisting of Instrumentarium Inc., a distributor of medical equipment; Federal Mailing Systems Inc., a sorter and distributor of U.S. mail; and Total Delivery, a warehouse company storing furniture, automobiles, and appliances.



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE 1"=2,000'

QUADRANGLE LOCATION

SOURCE: MODIFIED FROM USGS, MILWAUKEE QUADRANGLE, 1976

GENERAL ELECTRIC MEDICAL SYSTEMS GROUP
MILWAUKEE, WISCONSIN

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

GE_MED1.DWG - 03/13/92 - GFR - 209-R05032W12

The 300 West Edgerton Avenue location consisted of nearly 100,000 square feet, and the 315 West Edgerton Avenue location consists of about 61,000 square feet. GE Medical Systems currently employs 98 people at the 315 West Edgerton Avenue location.

Facility SWMUs identified during the PA/VSI include the following: (1) Scrap Metal Collection Area (SMCA) (SWMU 1); (2) Drum Storage Area (DSA) (SWMU 2); (3) Waste Oil Underground Storage Tank (Waste Oil UST) (SWMU 3); (4) Hazardous Waste Storage Area (HWSA) (SWMU 4); and (5) Aboveground Storage Tank (AST) (SWMU 5). Facility SWMUs are identified in Table 1. The facility layout is shown in Figures 2 and 3.

Currently, all hazardous wastes generated by GE Medical Systems are stored in the DSA (SWMU 2). The HWSA (SWMU 4) and AST (SWMU 5) at the 300 West Edgerton location were approved for closure by WDNR in 1989 (WDNR, 1989).

The facility manufactures electrical coils, casings, and other transformer parts and then assembles the parts into transformer power units used with x-ray equipment. The following raw materials are used in the manufacturing process: (1) copper wire for coils, (2) steel for transformer and coil casings, (3) adhesives and glues used to insulate and pressure-seal electric coils, (4) transformer oil used in transformers, and (5) electrical switches and panels for control units. The transformer oil does not contain polychlorinated biphenyls (PCB).

2.3 WASTE GENERATING PROCESSES

The GE Medical Systems facility has a total of four specific waste generating processes. These are: (1) degreasing and cleaning metal parts and equipment; (2) disposing of unused materials; (3) grinding and cutting metal parts; and (4) draining transformer oil from defective transformers. The wastes and the specific generating process at the facility are discussed below and are summarized in Table 2. Annual waste generation rates are based on 1988 waste generation data except scrap metal, which is based on 1991 data.

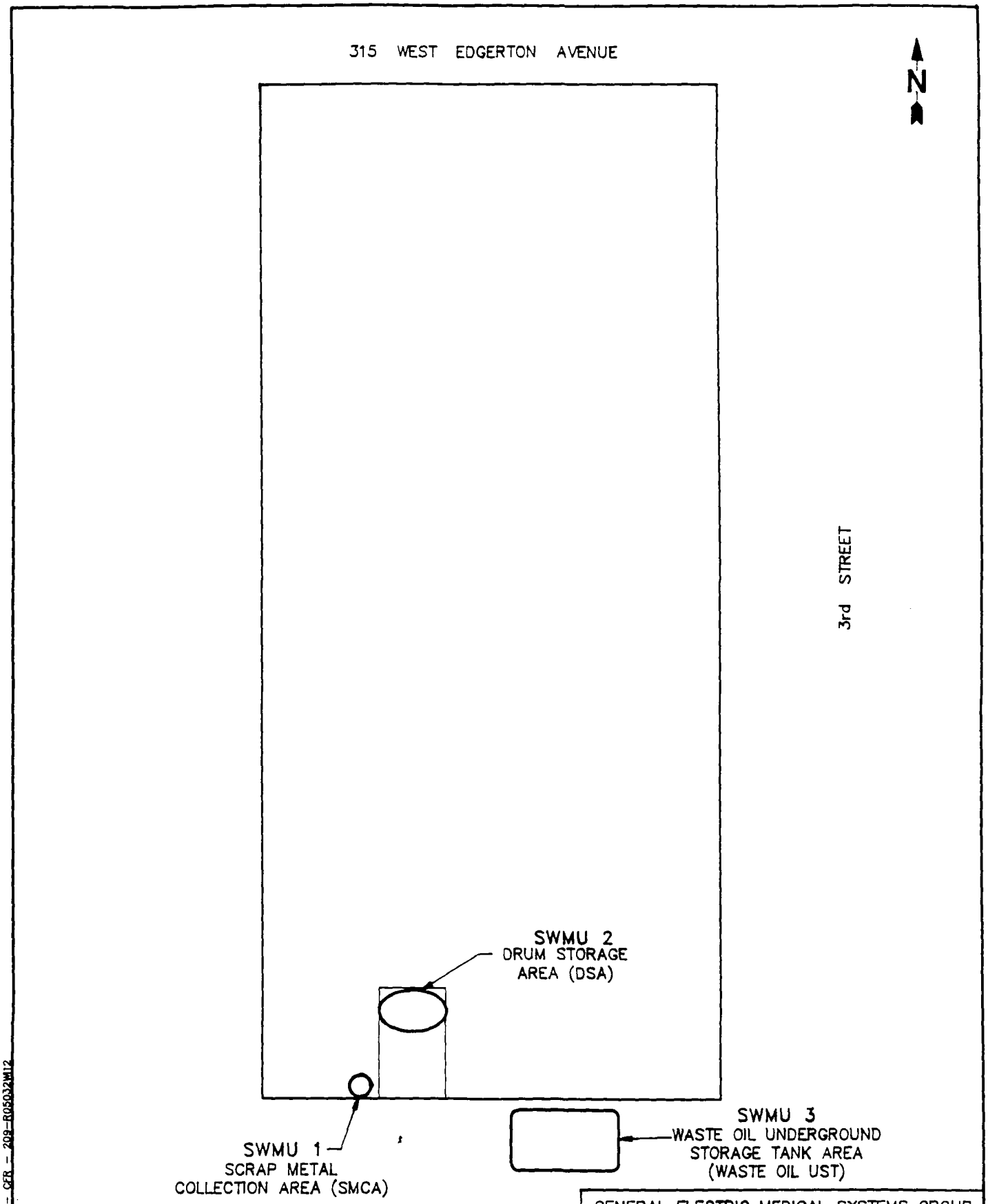
The cleaning and degreasing of metal parts and equipment results in the annual generation of: (1) 55 gallons of spent freon (F001 and F002) stored in the DSA (SWMU 2); (2) 55 gallons of spent acetone and xylene (F003) stored in the DSA (SWMU 2); (3) 635 gallons of spent and unused adhesives, resins, and isopropanol (D001) stored in the DSA (SWMU 2) or in the HWSA (SWMU 4); (4) 60 gallons of spent corrosive liquids (D002) stored in the DSA (SWMU 2); (5) 165 gallons of spent methylene chloride (F002) stored in the DSA (SWMU 2); (6) 100 gallons of spent 1,1,1-trichloroethane (F002) stored in the DSA (SWMU 2); (7) 55 gallons of unused ethyl acetate (U112) stored in the DSA (SWMU 2); and (8) about 50 gallons of spent mineral spirits

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Scrap Metal Collection Area (315 West Edgerton Avenue)	No	Active, stores nonhazardous waste
2	Drum Storage Area (315 West Edgerton Avenue)	Yes	RCRA closed in 1989, active for less than 90-day storage
3	Waste Oil Underground Storage Tank (315 West Edgerton Avenue)	No	Active, stores used transformer oil
4	Hazardous Waste Storage Area (300 West Edgerton Avenue)	Yes	RCRA closed in 1989, inactive
5	Aboveground Storage Tank (300 West Edgerton Avenue)	No	Removed in 1987

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



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SOURCE: MODIFIED FROM GE MEDICAL SYSTEMS, 1991

NOT TO SCALE

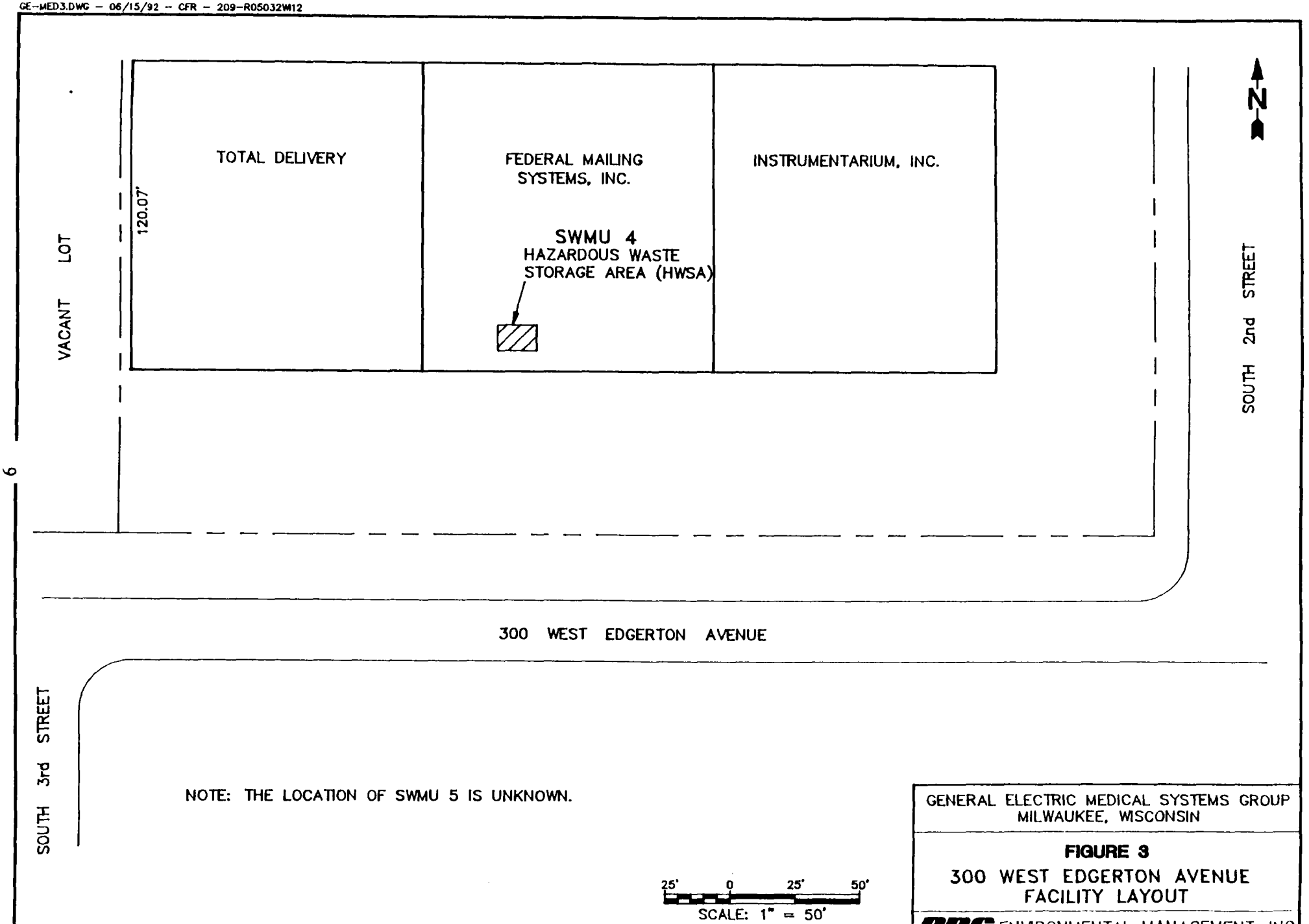
GENERAL ELECTRIC MEDICAL SYSTEMS GROUP
MILWAUKEE, WISCONSIN

FIGURE 2

315 WEST EDGERTON AVENUE
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

GE-MED3.DWG - 06/15/92 - CFR - 209-R05032M12



SOURCE: MODIFIED FROM GE MEDICAL SYSTEMS, 1980

GENERAL ELECTRIC MEDICAL SYSTEMS GROUP
MILWAUKEE, WISCONSIN

FIGURE 3

300 WEST EDGERTON AVENUE
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Units[a]
Spent freon/F001 and F002	Cleaning and degreasing	SWMU 2
Spent acetone and xylene/F003	Cleaning	SWMU 2
Spent and unused adhesives, varnishes, and isopropanol/D001	Partial usage of raw materials and cleaning of copper wire coils	SWMUs 2 and 4
Spent corrosive liquids/D002	Cleaning	SWMU 2
Spent methylene chloride/F002	Cleaning	SWMU 2
Spent 1,1,1-trichloroethane/F002	Cleaning of metal parts and equipment	SWMU 2
Unused ethyl acetate/U112	Cleaning of metal parts and thinning of adhesives and resins	SWMU 2
Spent mineral spirits/D001	Cleaning and degreasing	SWMU 2
Unused dibutyl phthalate/U069	Unused portion and off-specification product used as a catalyst for adhesives and resins	SWMU 4
Scrap metal/NA[b]	Metal grinding and cutting	SWMU 1
Used transformer oil/NA	Draining defective transformers	SWMUs 2, 3, and 5

Notes:

[a] Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

[b] Not applicable (NA) designates nonhazardous waste.

(D001) stored in the DSA (SWMU 2). Mineral spirits are also used in parts washers managed by Safety-Kleen Corporation; these parts washers are not considered as SWMUs for the facility. The disposal of unused material resulted in the annual hazardous waste generation of 30 gallons of dibutyl phthalate (U069) which was stored in the HWSA (SWMU 4) before 1989 (GE Medical Systems, 1992b and 1992c).

The grinding and cutting of metal parts results in the annual generation of 47,749 pounds of nonhazardous copper and iron scrap stored in the SMCA (SWMU 1). The draining of defective transformer results in the annual generation of 10,600 gallons of nonhazardous transformer oil stored in the DSA (SWMU 2), Waste Oil UST (SWMU 3) and the AST (SWMU 5) (GE Medical Systems, 1992b and 1992c). The nonhazardous transformer oil does not contain polychlorinated biphenyls.

E&K Hazardous Waste Services, Inc. (E&K), Sheboygan, Wisconsin, was the main transporter of wastes shipped off site during 1988. E&K transported spent freon; spent 1,1,1-trichloroethane; spent methylene chloride; and ethyl acetate to Safety-Kleen Corporation, Dolton, Illinois. E&K transported spent adhesives, resins, and isopropanol; spent acetone and xylene; spent corrosive liquids; and dibutyl phthalate to SCA Chemical Services, Inc., Chicago, Illinois; LWD Inc., Calvert City, Kentucky; and Industrial Fuels and Resources, Inc., South Bend, Indiana (GE Medical Systems, 1992b and 1992c). Moreco Energy Inc., transports the nonhazardous transformer oil to their facility, Mc Cook, Illinois (GE Medical Systems, 1992c). Miller Compressing Company or Balco Metals Company transports the copper and iron scrap metal off site to their facilities in Milwaukee, Wisconsin (GE Medical Systems, 1992a).

2.4 HISTORY OF DOCUMENTED RELEASES

No releases to ground water, surface water, air, or on-site soils have been documented at the GE Medical Systems facility.

2.5 REGULATORY HISTORY

The original Notification of Hazardous Waste Activity form filed by GE Medical Systems was not found in EPA or WDNR files. On November 6, 1980, the facility submitted a RCRA Part A permit application for 2,870 pounds of container storage (S01). The permit listed the following EPA waste codes: F001, F017, and U226 (GE Medical Systems, 1980). In January 1984, the facility submitted a RCRA Part B permit application to EPA at EPA's request (GE Medical Systems, 1984). Between November 1980 and February 1987, GE Medical Systems operated under interim status.

On February 9, 1987, GE Medical Systems requested that its Part A permit application be withdrawn and that the facility be changed from a hazardous waste storage facility to a hazardous waste generator (GE Medical Systems, 1987). On November 17, 1988, GE Medical Systems sent a hazardous waste generator activity change form to EPA and WDNR requesting a change in the facility's waste generation activity status from a large quantity generator to a small quantity generator and withdraw the Part B permit application for the 315 West Edgerton Avenue location (GE Medical Systems, 1988a). On December 4, 1988, GE Medical Systems submitted a revised EPA notification of hazardous waste activity to EPA and WDNR, changing EPA codes for wastes generated at the facility. The revised notification listed F001, F003, and D001 waste codes (GE Medical Systems, 1988b). The EPA never issued a Part B Permit Application because of the facility's request for withdrawal of the Part B Permit Application. WDNR approved closure of GE Medical Systems on January 26, 1989, for both site locations including the DSA (SWMU 2) and HWSA (SWMU 4) (WDNR, 1989).

WDNR inspected the facility in May 1982, September 1983, July 1985, November 1988 and December, 1988 and found GE Medical Systems in compliance (WDNR, 1982, 1983, 1985, 1988a and 1988b). WDNR also inspected the facility on December 12, 1986, and found eight deficiencies relating to recordkeeping, training, financial responsibility, emergency response, and revisions to the contingency plan. All deficiencies were resolved by the facility and acknowledged by WDNR (WDNR, 1986a).

The facility had an air permit for VOC emissions until 1986 when WDNR cancelled GE Medical System's air permit (WDNR, 1986b). The facility has no history of air permit violations or odor complaints from area residents. The facility has no sanitary pretreatment discharge. GE Medical Systems has applied for a Wisconsin Pollutant Discharge Elimination System (WPDES) permit for stormwater discharge. The facility submitted the WPDES permit application to WDNR on November 18, 1991 (GE Medical Systems, 1991). All water discharged from the facility consists of runoff from the roof and from the parking lots that surround the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the GE Medical Systems facility.

2.6.1 Climate

The climate in Milwaukee County is continental. The average daily temperature is 46.9°F. The lowest average daily temperature is 29 degrees Fahrenheit in January. The highest average daily temperature is 84.1 degrees Fahrenheit in July. The total annual precipitation for the county is 30.07 inches. The mean annual lake evaporation for the area is about 29 inches (USDA, 1971).

Winds are northwesterly from November through March, northeasterly from April through June, and southwesterly from July through October. March, April, and November are normally the windiest months, with an average wind velocity of 14 miles per hour. June and July are the least windy months, with an average wind velocity of about 10 miles per hour (USDA, 1971).

2.6.2 Flood Plain and Surface Water

The GE Medical System facility is not located in a 100-year or 500-year flood plain (FEMA, 1982). The nearest surface water body is Lake Michigan, about 3.6 miles east of the facility. Surface water from the facility drains in an easterly direction to storm sewers that ultimately discharge to Lake Michigan. The nearest area wetlands are about 2 miles southeast of this facility (WWI, 1989).

2.6.3 Geology and Soils

Blount silt loam underlays the 300 West Edgerton Avenue location. Blount silt loams occupy concave slopes in small drainageways and depressions; water runoff is adequately drained. Surface soil is very dark grayish-brown silt loam about 3 inches thick. Subsurface soil is about 5 inches thick and is brown silt loam. Morley silt loam underlies the 315 West Edgerton Avenue location. Morley soils are well drained to moderately well drained, silty soils over calcareous, silty, clay loam, glacial till. The surface layer of Morley silt loam is very dark, grayish-brown silt about 4 inches thick. The subsurface soil layer is brown silt loam also about 4 inches (USDA, 1971).

Facility-specific geological information is not available. Geological bedrock units in the general vicinity of the facility from top to bottom, include the following: (1) glacial deposits at a depth of 0 to about 60 feet; (2) Niagaran dolomite at a depth of about 60 to 500 feet; (3) Maquoketa Shale (an aquitard) at a depth of about 500 feet to 700 feet; (4) Sinnipee Sandstone at a depth of about 700 feet to 900 feet; (5) St. Peter, Eau Claire and Mt. Simon Sandstones at a

depth of about 900 feet to 1,700 feet; and Precambrian rocks consisting mainly of quartzite starting as a depth of about 1,700 feet (Rogers, 1986; and USGS, 1973). An area geological bore log reveals that glacial deposits extend 75 feet below ground surface about 1 mile east of the facility (WGNHS, 1992). No other geological bore logs are available within 2 miles of the facility.

2.6.4 Ground Water

Principal ground-water sources in Milwaukee County include the glacial sand and gravel aquifer, the Niagara dolomite aquifer, and the Sinnipee and St. Peter Sandstone aquifers. Three inactive well drilling logs within 1 mile of the facility indicate that the ground-water level ranges from 14 feet to 45 feet below ground surface (WGNHS, 1992).

Past use of ground water in the sand and gravel aquifer and the Niagara dolomite aquifer caused large cones of depression in Milwaukee County. Ground water movement is basically from the west to the east toward Lake Michigan. Well yields were as high 1,200 gallons per minute and as low as 10 gallons per minute for the Niagara aquifer. Well yield data for the sand and gravel aquifer is unavailable (USGS, 1973). All the facility's drinking water is supplied by Lake Michigan. There are two isolated, active drinking water wells located about 1.5 and 2.9 miles southwest of the facility. No geological or ground-water data regarding these two wells is available (City of Milwaukee, 1992).

2.7 RECEPTORS

The GE Medical Systems facility is located in a mixed-use area within an industrial park in Milwaukee, Wisconsin. Milwaukee has a population of about 628,088 (Rand McNally Corporation, 1992).

The 2.2-acre location at 315 West Edgerton Avenue is currently operational. It is bordered on the north by Edgerton Avenue, on the west by a vacant lot; on the south by a warehouse owned by C & H Distributors, Inc., a product distributor for business and industry; and on the east by Third Street. Airport support services and freight terminal companies are located across Third Street.

The nearest school, St. Stephen's School, is located about 1 mile southeast of the facility. Facility access is controlled by locked doors. Access to the Waste Oil UST (SWMU 3) is controlled by a locked fence surrounding the tank area.

Lake Michigan is the closest surface water body, located about 3.6 miles east of the facility. GE Medical Systems does not use ground water as a drinking or industrial water supply. The nearest industrial water well is more than 2 miles south of this facility. A determination on whether or not this well is upgradient or downgradient cannot be made because this well is south of the facility and ground water flow is west to east. The nearest private active drinking water well is located 1.5 miles southwest and upgradient of the facility. No downgradient wells have been identified.

Local residences are located within 0.5 mile west of the facility. Sensitive environments are not located on site. The nearest wetland area is located in Oak Creek, Wisconsin, 2 miles south-southeast of the facility . This wetland is forested by broad leaf deciduous trees, and contains standing water (Palustrine) (WWI, 1989).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented release, and PRC observations.

SWMU 1	**Scrap Metal Collection Area (315 West Edgerton Avenue)**
Unit Description:	This unit is located next to the loading dock at the southwestern end of the building. Scrap metal is collected from various areas inside the facility and is stored in drums. Scrap metal is recycled off-site when one or two drums are full. Scrap metal is picked up by Balco Metals Company or Miller Compressing Company. The unit is made of concrete and is sealed with epoxy.
Date of Startup:	This unit began operation in the early 1970s.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous scrap copper and iron in containers. Wastes from this unit are ultimately picked up for off site recycling.
Release Controls:	The unit is located on a sealed concrete floor. No floor drains are located in satellite accumulation areas.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained copper and steel scrap materials stored next to the loading dock. This material was stored in an open 55-gallon drum. PRC observed no evidence of release.
SWMU 2	**Drum Storage Area (315 West Edgerton Avenue)**
Unit Description:	This unit is located above ground, inside the southwest section of the building. The unit is used to store virgin materials and hazardous and solid wastes for less than 90 days. The unit

	measures 120 square feet. The unit consists of concrete masonry walls, concrete floors, and steel entryways. All floors are epoxy-sealed (see Photograph No. 1).
Date of Startup:	This unit began operation about 1971.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages hazardous and solid wastes in containers. This includes spent freon (F001 and F002), spent acetone and xylene (F003), spent and unused adhesive, varnishes and isopropanol (D001), spent corrosive liquids (D002), spent methylene chloride (F002), spent 1,1,1-trichloroethane (F002), unused ethyl acetate (U112), and used transformer oil (no EPA codes). Wastes from this unit are ultimately picked up for off-site recycling.
Release Controls:	This SWMU is completely enclosed by concrete masonry walls, a sealed concrete floor, and floor trenches around the perimeter of the room. All floor trenches lead to a 5,000-gallon secondary spill containment tank outside the facility, south of this SWMU.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained four unlabeled drums of wastes. GE Medical Systems representatives stated that the four drums contained xylene, and adhesives and resins, and oil. PRC observed no cracks in the concrete floors, and trenches were clean and free of residue. PRC observed no evidence of release.
SWMU 3	**Waste Oil Underground Storage Tank (315 West Edgerton Avenue)**
Unit Description:	The Waste Oil UST is located outside the south end of the facility location. This unit consists of one 4,000-gallon tank for nonhazardoous waste transformer oil containing no polychlorinated biphenyls. The unit is made of steel with a concrete pad covering the tank (see Photographs No. 2 and 3).

Date of Startup:	This unit began operation in about 1971.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages used, nonhazardous transformer oil (no EPA codes) that is free of polychlorinated biphenyls. Wastes from this unit are ultimately recycled.
Release Controls:	This unit is located underground. The concrete pad above the tank is well maintained, and the Waste Oil UST has cathodic protection and a leak detection device (GE Medical Systems, 1992b).
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	During the VSI, PRC observed no visible cracks in the concrete pad located above the Waste Oil UST. However, PRC did observe a crack between the concrete masonry walls and the concrete pad covering the tank. PRC noted a black stain on the concrete that covered the area from the pump to the concrete masonry wall.
SWMU 4	**Hazardous Waste Storage Area (300 West Edgerton Avenue)**
Unit Description:	This unit was located above ground and indoors. The unit measured approximately 10 feet by 15 feet and consisted of a concrete floor and concrete masonry walls (see Photograph No. 4).
Date of Startup:	This unit began operation in about 1971 (GE Medical Systems, 1992b).
Date of Closure:	This unit is inactive; WDNR approved its RCRA closure in 1989 (WDNR, 1989).
Wastes Managed:	This unit managed hazardous wastes (D001 and F002) in containers. Wastes from this unit were ultimately recycled or disposed of off site.

Release Controls:	The unit has been removed. Previous release controls consisted of a concrete floor and concrete masonry walls.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	This SWMU is closed and inactive. PRC observed no evidence of release.
SWMU 5	**Aboveground Storage Tank (300 West Edgerton Avenue)**
Unit Description:	The 5,000-gallon AST was located outdoors. The exact location is unknown. The unit was used to store nonhazardous waste transformer oils. Transformer oil stored in this unit did not contain PCBs. Exact dimensions of the unit are not known.
Date of Startup:	This unit began operation about 1971.
Date of Closure:	This unit underwent closure and was removed in February 1987 (GE Medical Systems, 1992b). WDNR approved its closure in 1989 (WDNR, 1989).
Wastes Managed:	The unit managed used, nonhazardous transformer oils (no EPA codes). Wastes from this unit were ultimately recycled off site.
Release Controls:	The unit has been removed. No documentation is available on release controls.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	At the time of the VSI, GE Medical Systems personnel were unsure where the unit was located. Current tenants of the leased property had completely gutted and remodeled the 300 West Edgerton Avenue location.

4.0 AREAS OF CONCERN

PRC did not identify any AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs at the GE Medical Systems facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 follows the text and summarizes the SWMUs at the GE Medical Systems facility and recommended further actions.

SWMU 1 **Scrap Metal Collection Area (SMCA)**

Conclusions: Scrap copper and iron metal is stored in this unit before being recycled off site. PRC observed no evidence of spills or contamination in the area. The unit has a low potential for release to ground water, surface water, air, and on-site soils, because this unit is inside and all scrap metal is stored in drums on a sealed concrete floor.

Recommendations: PRC recommends no further action at this time.

SWMU 2 **Drum Storage Area (DSA)**

Conclusions: Hazardous and solid wastes are stored in this unit for less than 90 days. This unit was RCRA closed and approved by the WDNR in 1989. All wastes are stored in a secure area with adequate spill containment and release controls. During the VSI, GE Medical Systems had not placed hazardous or nonhazardous waste labels on four waste drums stored in the DSA; likewise, none of the drums were marked with the accumulation start date. The unit has a low potential for release to ground water, surface water, air, and on-site soils, because all waste is stored in a locked, contained room with a concrete floor and there is a secondary containment tank attached to this unit.

Recommendations: PRC recommends that EPA advise GE Medical Systems to properly label all drums of waste.

SWMU 3 **Waste Oil Underground Storage Tank (Waste Oil UST)**

Conclusions: This SWMU stores nonhazardous waste transformer oil that is recycled off site. The unit has a low to medium potential for release to ground water, surface water, air, and on-site soils because an oil spill on the concrete pad may migrate through the crack between the concrete masonry wall and the concrete pad.

Recommendations: PRC recommends that GE Medical Systems seal the crack between the concrete masonry wall and the concrete pad. This preventive maintenance will help to ensure that oil spills in the area do not contaminate the ground below the concrete pad.

SWMU 4 **Hazardous Waste Storage Area (HWSA)**

Conclusions: This unit stored solid and hazardous waste and WDNR approved RCRA closure in 1989. The unit had a low potential for release to ground water, surface water, air, and on-site soils. No evidence of spill or release was noted during the VSI and there are no regulatory records that state otherwise.

Recommendations: PRC recommends no further action at this time.

SWMU 5 **Aboveground Storage Tank (AST)**

Conclusions: This unit was used to store nonhazardous waste transformer oil. WDNR approved closure of the unit in 1989. The actual location of this SWMU is unknown. The unit had an unknown potential for release to ground water, surface water, air, and on-site soils. However, WDNR approved this unit's closure and no evidence of spill or release was noted during the VSI in or outside the facility.

Recommendations: PRC recommends no further action at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Scrap Metal Collection Area	1971 to present	None	No further action
2. Drum Storage Area	1971 to present	None	GE Medical Systems must properly label all drums
3. Waste Oil Underground Storage Tank	1971 to present	None	Seal the crack between the concrete masonry wall and pad
4. Hazardous Waste Storage Area	1971 to 1989	None	No further action
5. Aboveground Storage Tank	1971 to 1989	None	No further action

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WDNR, 1983. Letter from Francis J. Treka to Dennis Hussey, GE Medical Systems, October 3.

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WDNR, 1986b. Letter from Dennis Antonie to Dennis Hussey, GE Medical Systems, August 8.

WDNR, 1988a. Hazardous Waste Compliance Monitoring and Enforcement Summary for GE Medical Systems, November 16.

WDNR, 1988b. Hazardous Waste Compliance Monitoring and Enforcement Summary for GE Medical Systems, December 20.

WDNR, 1989. Letter from Franklin Schultz to David Baranowski, GE Medical Systems, January 26.

Wisconsin Geological and Natural History Survey (WGNHS), 1992. Water Well and Geological Logs for Milwaukee County Area, Township 6 North, Range 22 East, Open File, Reviewed February 27.

Wisconsin Wetlands Inventory (WWI), 1989. Wisconsin Wetland Inventory Map for Milwaukee County, Township 6 North, Range 22 East, February 27.

ATTACHMENT A

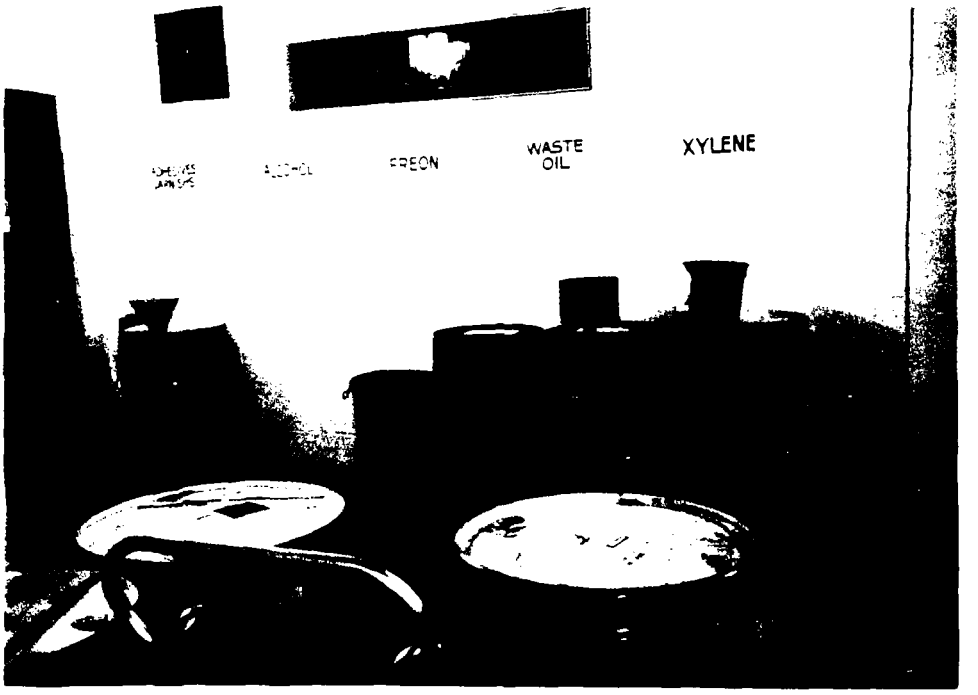
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

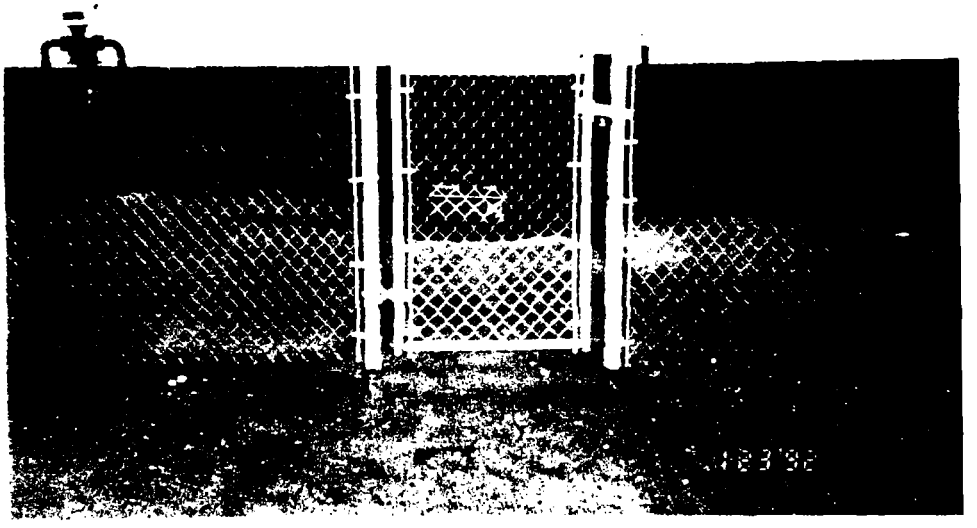
GE Medical Systems
Milwaukee, Wisconsin
WID 000 808 725

Date:	January 23, 1992
Facility Representatives:	Neil Budahn, Plant Manager Al Hauser, Plant Engineer
Inspection Team:	Ken Valder, PRC Environmental Management, Inc. (PRC) Kurt Whitman, PRC
Photographer:	Ken Valder, PRC
Weather Conditions:	Windy, overcast, about 33 degrees Fahrenheit.
Summary of Activities:	The visual site inspection (VSI) of the 315 West Edgerton Avenue location began at 8:50 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed GE Medical Systems past and current operations, solid wastes generated, and release history. GE Medical Systems representatives provided the inspection team with copies of documents requested. The VSI tour began at 9:15 a.m. PRC inspected the training center, the manufacturing facility, the maintenance area, and three SWMUs. The 315 West Edgerton Avenue tour concluded at 10:15 a.m., after which the inspection team held an exit meeting with GE Medical Systems representatives. The VSI was completed and the inspection team left the facility at 10:25 a.m. At 10:25 a.m., PRC began the VSI of the 300 West Edgerton Avenue location. Ms. Jackie Bach of Instrumentarium, Inc., gave PRC a tour of the office-warehouse facility. Instrumentarium, Inc., distributes x-ray equipment. No SWMUs or AOCs were identified. The VSI ended at 10:32 a.m. PRC proceeded to Federal Mailing Systems, Inc. (Federal Mailing), to discuss the purpose of the VSI with Ms. Tracy Saygo. Federal Mailing sorts and distributes mail for the U.S. Postal Service. The GE Medical Systems former Hazardous Waste Storage Area (SWMU 4) was located in the portion of the building now occupied by Federal Mailing. No SWMUs or AOCs were identified. PRC left Federal Mailing at 10:43 a.m. PRC then proceeded to Total Delivery. PRC met with Pam Wozney to discuss the purpose of the VSI. Total Delivery warehouses cars, furniture, and appliances. No SWMUs or AOCs were identified. PRC left Total Delivery at 10:46 a.m.

At 10:46 a.m., PRC inspected the grounds outside the building. No additional SWMUs or AOCs were identified. PRC completed the VSI of the 300 West Edgerton Avenue location at 10:51 a.m.



Photograph No. 1 Location: SWMU 2
Orientation: Northwest Date: 01/23/92
Description: This picture shows four drums of unlabeled waste stored in the DSA.



Photograph No. 2 Location: SWMU 3
Orientation: North Date: 01/23/92
Description: The fenced-in area contains the pump and piping used to transfer transformer oil to and from the underground storage tanks.

Photograph No. 3 Location: SWMU 3
Orientation: Northwest Date: 01/23/92
Description: This picture shows the location of the Waste Oil UST.

Photograph No. 4 Location: SWMU 4
Orientation: East Date: 01/23/92
Description: This picture shows the approximate location of the former HWSA, now occupied by Federal Mailing Systems, Inc.

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

GE MEDICAL SYSTEMS 1-23-92
MILWAUKEE, WI
WID

315 W. EDGERTON AVE.

W - VACANT LOT
N - " , 300 W. EDGERTON
NW - ASSOCIATED SPRING, BARNES GROUP, INC.
RESIDENCES 2 BLOCKS WEST ON 6TH STREET
S - C&H DISTRIBUTORS W'HOUSES
E - SKYCHEFS, ROYAL TRANSP SVCS, INC., CIRCLE FLT INT'L

FROM: 300 W. EDGERTON
E - POST OFFICE
N - J.H. COLLECTIBLES OUTLET STORE

MOTELS ARE LOCATED ON 1ST STREET & HOWELL AVE

0850 Arnie @ Site Meet Neil Bodahn, Chuck Dzickzic, Bob Westhouse, Alan Hauser

300 Edgerton facility abandoned Apr'l 88. Went from Cardiac to cable mfg in 1983. Mfg stopped in late 1987.

This building (315 Edgerton) is leased from Sampson.

GE first came into facilities in early 1920s. Other products have been mfrd here as well. Dennis Massey (Waukesha) may be able to help with history.

Current employees - 98

Square footage - about 61,000 s.f.

Acreage - unknown

Currently SAG.

Stormwater discharge permit (NPDES). Facility reps unclear on where water comes from, discharge point.

Unaware of history prior to GE.

Only domestic sewage + sanitary. No process water.

No g.w. monitoring wells on site.

Produce transformers (high-voltage).

VF115 Class starts @ Training Center. Hands-on training for field service people. Wastes here are all household/office + type.

Remodeled - October 1991

Water + roll off.

0922 Safety - Klein parts washer in Maintenance area uses mineral spirits. Safety - Illeen comes in to remove the spirits

Some machining, wood work here to keep m/s going - 3 people here

Wash oil captured & pans (plastic) and carried to Oil House for finished draining

0927 Fluor room: Laminations (high temp) are cut. Secondary winding An air drying varnish is put on the coils. If varnish windows are ground, they are placed in the oil house

60-70 transformers. Also supply Electric Avenue facility w/ the parts

Stator assembly area

Propane containers are emptied → garbage

~~Potting~~ Epoxy potting operation. Parts are covered w/ epoxy caps. Epoxy fumes vented to atmosphere

Varnish impregnator tanks / varnish storage located over a pit w/ metal grating

The impregnating was a varnish w/ roughly 40% xylene.
After impregnation, they are air dried and exhausted to the air under a permit.

A dip tank was removed c 1987.

Hardened varnish (after drying) is chipped off transformers onto grates table. The table is vacuumed once/day and the chips are added to Solid waste (non-haz) stream for facility. Disposed at end with refuse.

All parts made on east side of plant are taken to west side of plant for assembly.

Make single-phase/three-phase transformers

Scrap metal taken to Ace Warehouse (Copper & steel) for recycling

After transformers are assembled, they are tested and over dried to remove residual moisture. After oven → evacuation to take air out. Oil is introduced under a vacuum.

Waste oil from bad transformers is pumped into 4,000-gallon UST holding tank ~~NW~~ out back.

This oil is recycled.

0952 Oil House. The waste area is labelled as such. Labelled for adhesive varnishes, alcohol (isopropyl), freon (for vapor degreaser), waste oil, and xylene.

Drums are usually removed every 1-2 months. Safety Klean takes the waste. Sealed concrete floor w/ trenches around the entire room.

The trenches drain into 5,000-gallon UST spill emergency holding tank. Note that the xylene drum is not labelled w/ HW label. New is varnish. No alcohol or freon drums here now. One plastic trash container holds a pig used for emergency spill cleanup.

0958 Pic 1 NW View of DSA.

A smaller transfer room where most'l pumped into smaller containers.

Room has 2 air ducts.

West of cal house is a cylinder storage area. Empty cylinders are stored w/ full cylinders.

Dne drum of scrap steel here, will be trucked out for recycling.

1025 Outdoors - Storm water drains in asphalt parking lot Lot sloped to drains.

3 Tanks @ S end of facility.
8,000-gal emergency tank.
4,000-gal waste oil
20,000-gal virgin oil
One 20,000-gal tank was removed in 1987 ~ 1988

At pump-in area, some oil has spilled to ground.

PIC 2 N
PIC 3 NW

The CMU wall is not sealed into the concrete floor @ pump area (see PIC 2)

1015 Indoors → requested documentation It is provided

1025 Out of here → access to 300 W Edgerton to Instrumentarium Imaging Manufacturers rep. Test beds for x-ray equipment Met w/ Jackie Bach

They also have a magnetic resonance system in place. Also, process application area

Completely office/warehouse space.

1032 Exit. Enter Federal Mailing Systems. Process mail for companies. Mail is sorted = office space

This is where the old DSA was located. Floor now clean and complete. Tracy Sessions.

1041 Pic 4 E. View of old DSA, as close to it based on last as maps, it would have been close to the middle of the aisle

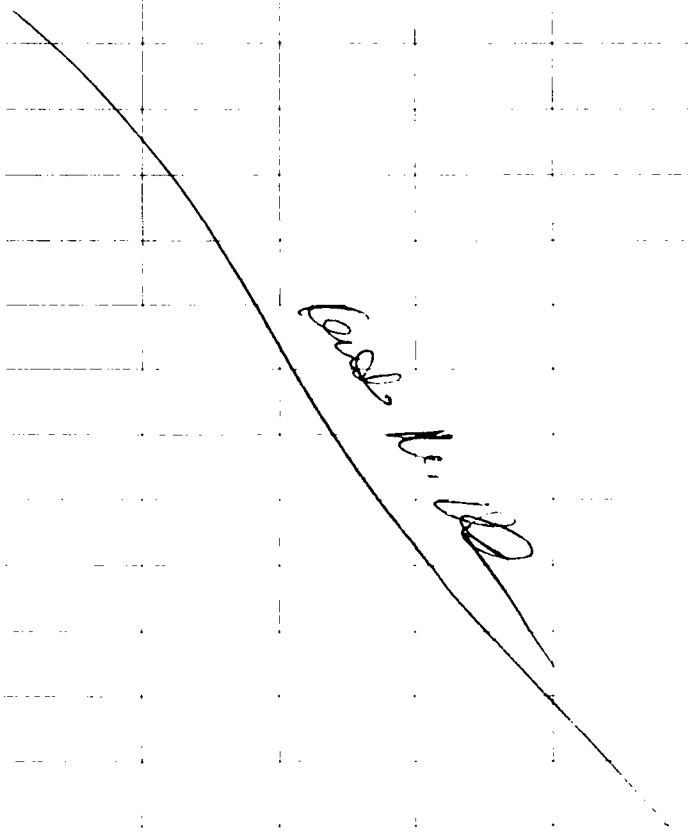
1043 Exit

Mail Pam Wiering of Total Delivery Warehouse for appliances and furniture. Some industrial clients

1046 Exit → site reconnaissance

1052 Leave for back of GE to investigate a ~200 gallon tote that had been dropped (illegally) @ their plant. The police dept (one squad car) and fire dept. (HAZMAT) were there to assess for site safety. After talking with Bob Westhouse, who tells me they will deal with it (haz. codes 2, 1, 1, water-reactive) labeled in box of plastic tote.

1055 Exit site.
T = 33°F. Overcast, snowflurries,
W. Winds (moderate)



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1-23-92

0850 hrs meet with
Neil Buhahn & Chuck Dziedzic &
Bob Westhuse & Al Hauser present
from GE. Kurt Whitman & Ken Vidler present from PRC.
300 - W Edgerton Ave
was Shutdown in April of 1988
& manufacturing stopped in late 1983
In 1984 Cordev system was
Shutdown & cable harness division
Setup.
315 W. Edgerton Ave is
owned by Sampson Investments
Estimated date of operation is
the early 1970's.
This GE facility has had different
operations (i.e. heart pacemaker, dental
divisions).
Current # of people employed is 98.
01/23/92 [illegible]

Square footage is 61,000 sq ft
Acreage size is unknown
Small quantity Generator status
Has WPDES permit but they are
[illegible]
Previous tenants unknown. Bldg built
in early 1960's.
Domestic sewer only
NO GW monitoring wells.

Current operations at plant:
Produce transformers (high voltage)
only. NO manufacture of cable
harnesses or other parts
Neil, Chuck & Al went with Ken V. & I on tour
0913 - Started VSI
with inspection of training
center (X-Ray center)
Caution Radiation Area Sign
Training Center was 01/23/92 [illegible]

remodeled October 1991
Garbage (other) Dumpster on E.
side of bldg. Training center had
no AOC's or SWMU's
0910 Visited Maintenance Area
small degreasing station in
NW corner of Maintenance area
Degreaser is Mineral Spirits
Metal machining done in
maintenance area & woodwork

Process station w/ all the
coiling of lamination wire
SE corner of bldg

Varnish lamination is done
with brushes. Disposal
is put in oil Room with
other waste

01/23/92 [illegible] White

this facility supplies
components for other GE
facilities
Propane fuel tanks are
used. They are purged
depressurized and put in garbage
for disposal.
Epoxy sealant used in
Epoxy Potting operation on
East Wall. 2 PART
Epoxy fumes vented to
Atmosphere. No air permit
for this unit. Parker Env.
Services did the testing to check VOC emission
Trough by Varnish Storage tank
Impregnator area may have
small amounts of drippings in
bottom of trough. Varnish is thinned
w/ xylene. NOT AOC
[illegible] White
01/23/92

Air permits for the Varnish Impregnator Area & Drying Oven area for VOC emission.
1987 the coil process dip tank was removed which reduced waste volume & VOC emissions.
After drying of coils varnish is chipped! Closure of this unit due.
Note that after dip drying process varnish on the coils from process all put on storage framework for wire before going into oven.
Small amounts of black gray varnish frame & small amounts of amber to brown colored resin generated that are put into drums.
No AOC's or SWMU.

SWMU #1 Scrap metal collection in satellite area at area back by loading dock.

01/23/92 [illegible] Whitten

2 types transformer -
Single phase & 3 phase types are produced on assembly line.
All scrap metal recycled (copper & steel) are sent Ace Warehouse in Milw. WI (Howell & College Ave) or Miller Compressing.
After assembly all units are sent to a drying oven for one hr @ 175 °F. to remove moisture & cure [illegible].

Waste Transformer Oil is generated if a transformer blows. The oil is removed & then stored in 4000 gallon holding tank.
Hauler for waste transformer oil is unknown. Al will check records.
Oil is recycled.
TANK is below ground.

01/23/92 [illegible] Whitten

Shell Diala (mineral oil) transformer fluid.

0952 - Into oil storage room

Storage room: Haz. Waste & Material Storage Area

Adhesive Alcohol Freon Waste Xylene Varnisher (Isopropanol) oil (Sumu #2) -

NO waste labels (hazardous) on any drums. NO generator accumulation start dates or Haz. Waste labels

Waste is moved every few months by Safety Kleen.

VSI indicated that generator is in violation of RCRA because labelling of drums was not done.

01/23/92 Dave Whitman

Triethylaetetramine is stored as a product in 1 gallon glass jar in metal container. This material is used as a hardener. Empty jars are thrown out in dumpster

Troughs in oil storage area are clean. NO signs of spillage.

Dispersion stored in open are used as material and trays are discarded in dumpster when done.

Storm sewer drainage leads due east from SW corner of bldg.

01/23/92 Dave Whitman

1006 SWMU #3
UST Three tanks:

Emergency oil tank 8000 gl
oil recovery 4000 gl
New oil tank 20,000 gl.

UST tank was removed
from the SE corner of bldg.
in 1988. (20,000 gl tank moved
out)
Small visible area of oil
spillage. Dk brown/black
area by pump on
south side of bldg.
Large ~~[illegible]~~ new visible signs of cracking
in foundation by storage ~~tanks~~ (outside)
Waste Oil recycler is Effluent Technology, Inc
1601 W. 47th St
McCook, IL 60525

01/23/92 [signature]

Underground Storage tanks are
in line from West to East

1020 Exit GE
Note: that concrete foundation by oil storage tank
area has pulled from the south wall of building (≈1/4 gap)
10:27 Started @ Instrumentarium
Visit w/ Jackie Bach
300 W. Edgerton Ave
Manufactures Representative
of XRAY equipment
This office / warehouse area
was completely gutted &
redone. No problem noted
10:32 NO SWMU's or AOC's noted.
Exit Instrumentarium

10:35 Stop in @
Federal Mailing Systems, Inc
300 W. Edgerton Ave

01/23/92 [signature]

Process mail for US Postal Service
office / warehouse / process area for mail. Bldg was Completely redone + gutted.

Tracy Sagg'd visited w/us + gave us brief site tour
NO ACC's or summ's noted

10:43 Exit Federal Mailing System

Donna White
01/23/92

10:45 Total Delivery
Pam Wasnell
Storage depot
Warehouse / office facility for storage of appliances etc (furniture

– END VISIT –

Donna White
01/23/92